

Volume

1

Accessibility Standards for Customer Service - Ontario Regulation 429/07



Church Guide to Accessibility

ACCESSIBILITY STANDARDS FOR SERVICE

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December 2009

Accessibility Standards for Customer Service - Ontario Regulation 429/07

“This Regulation establishes accessibility standards for customer service and it applies to every designated public sector organization and to every other person or organization that provides goods or services to members of the public or other third parties and that has at least one employee in Ontario. The accessibility standards for customer service apply to the designated public sector organizations on and after January 1, 2010 and to other providers of goods or services on and after January 1, 2012.” Churches are considered private sector organizations.

Table of Contents

POLICIES, PRACTICES AND PROCEDURES.....	1	EVALUATION	15
CORE PRINCIPLES - INDEPENDENCE, DIGNITY, INTEGRATION AND EQUALITY OF OPPORTUNITY	2	THE CHURCH ACCESSIBILITY COMMITTEE SHOULD:	15
ASSISTIVE DEVICES POLICY .	4	APPENDICES	17
COMMUNICATION.....	6	Appendix A: Churches Accessibility Policy Template.....	17
GUIDE DOGS OR SERVICE ANIMALS.....	8	Appendix B: Sample Documents for Notifying Church Attendees about Disruptions in Service	20
SUPPORT PEOPLE	9	Appendix C: Sample Documents for Obtaining Feedback.....	21
FEES.....	10	Appendix D: Sample Notices on the Feedback Process	23
NOTIFICATION OF DISRUPTIONS	11		
STAFF AND VOLUNTEER TRAINING.....	13		
STAFF, VOLUNTEERS, USHERS AND GREETERS.....	13		
CHURCH ADMINISTRATION .	14		

Policies, Practices and Procedures

Establish policies, practices and procedures on providing programs and services to people with disabilities

In order to fulfill this requirement of the Ontario Regulation 429/07, the following are guidelines for churches.

- Establish a church Accessibility Committee with representation from Church attendees and the family of church attendees with disabilities



The Accessibility Committee will:

- Formulate policies based on church attendee feedback, committee consensus and in consultation with **“Appendix A” (sample policy template)** and other resources. Other resources may include the following online website:

<http://www.mcsc.gov.on.ca/NR/rdonlyres/C3048A23-B149-4BC1-9133-17EC3BF58FD8/3822/ComplianceManual2.pdf>

- Present draft policies to church board/leadership for approval.
- Monitor church practices and procedures to ensure consistency with governing policies.

If your church has 20 or more employees refer to Chapter 10 in the link listed above for document requirements. For a sample policy template refer to Appendix A.

Core Principles - Independence, Dignity, Integration and Equality of Opportunity

Use reasonable efforts to ensure that church policies, practices and procedures are consistent with the core principles.

In order to fulfill this requirement of the Ontario Regulation 429/07, the following are guidelines for churches.



The Accessibility Committee reviews policies, practices and procedures to ensure they are consistent with the following interpretation of the following principles:

- **Dignity** - service is provided in a way that allows the person with a disability to maintain self-respect and the respect of other people.
- **Independence** - when a person with a disability is allowed to do things on their own without unnecessary help or interference from others.
- **Integration** - service is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other church attendees, unless an alternate measure is necessary to enable a person with a disability to access services or programs
- **Equal opportunity** - service is provided to a person with a disability in such a way that they have an opportunity to access your services and programs equal to that given to others.

Assistive Devices Policy

Set a policy on allowing people to use their own personal assistive devices or church assistive devices to access church programs and services.

In order to fulfill this requirement of the Ontario Regulation 429/07, the following are guidelines for churches.



Specifications within the church policy should take into consideration the following:

- Church attendees are permitted to use their own personal assistive devices to access sanctuary ritual practices and other services and programs offered in the church setting.
- Church attendees are permitted to use their own personal assistive devices to access all other church facility rooms and programs.
- The church makes every effort to provide assistive devices requested or deemed necessary by the Accessibility Committee for accessing programs and services.
- Ushers and other front-line church staff are trained on how to use the assistive devices available on church premises and familiarized with the various assistive devices that may be used by attendees with disabilities.
- Upon a church attendee's request to the Accessibility Committee, the church will make every effort to provide the requested assistive devices and/or services and cover relevant financial expenses (when funds are available).
- The Accessibility Committee is responsible for ensuring that assistive devices provided by the church are in good working order, that ushers and front-line staff are trained on how to operate these devices, and that requests for assistive devices are met.

Where relevant, if certain church practices or considerations prevent the use of certain assistive devices, it is the responsibility of the church to provide other appropriate/alternative accommodations for members with disabilities.

Communication

Communicate with a person with a disability in a manner that takes into account his or her disability.

In order to fulfill this requirement of the Ontario Regulation 429/07, the following are guidelines for churches.



Direct Communication:

- Use TTY telephony services to make telephone calls to church attendees, if appropriate.
- Use a church attendee's assistive device to communicate with them only when permitted by the member or their support person.
- Communicate directly with church attendee, not their support person.
- Equip ushers and greeters with a notepad and pen, a picture board or alternative communication aids.
- Provide visuals when announcing page numbers.
- Display visual of entire sequence of service at front of sanctuary and provide visual cues at each step of the progression.
- Use visuals when conducting sermons and other educational discussions (e.g. diagrams, charts, full transcripts, summaries, live captioning, etc...).
- Avoid overly wordy and complicated language. Explain difficult terminology in sermons and other educational discussions, or when communicating with a attendee who might be otherwise confused.
- Politely ask church attendee to repeat what they have said if you do not understand.

Indirect Communication:

- Provide church weekly bulletins/newsletters/publications in alternative formats (e.g. large-print, plain-language, electronic version, etc...).
- Ensure church website is compatible with assistive software and in large font.

Guide Dogs or Service Animals

Allow people with disabilities to be accompanied by their guide dog or service animal in those areas of the premises you own or operate that are open to the public, unless the animal is excluded. If a service animal is excluded, use other measures to provide services to the person with a disability.

In order to fulfill this requirement of the Ontario Regulation 429/07, the following are guidelines for churches.



- Provide opportunities for church attendees to introduce/talk about their service animal to the congregation.
- Permit church attendees to be accompanied by their service animal within all parts of the church.
- Provide appropriate accommodations for both church attendees and their service animal under circumstances in which church functions may exclude service animals.

If your church has 20 or more employees refer to Chapter 10 in the link listed above for document requirements

Support People

Permit people with disabilities who use a support person to bring that person with them while accessing programs or services in the church premises that is open to the public or third parties.

In order to fulfill this requirement of the Ontario Regulation 429/07, the following are guidelines for churches.



- Permit church attendees to be accompanied by their support person when participating in the church service.
- Encourage the participation of support persons in communal church practices whenever possible.
- Make efforts to ensure support persons feel welcome.
- Offer an informal lesson to orient support persons (who might otherwise be unfamiliar) with church practices and rituals.
- Work with support persons, in relevant situations, to customize behavioral plans for church attendees.
- Announce when programs or services would likely require some church attendees to be accompanied by a support person.

Fees

Where any fees are charged, provide notice ahead of time on what fees, if any, would be charged for a support person of a person with a disability.

In order to fulfill this requirement of the Ontario Regulation 429/07, the following are guidelines for churches.



support persons

- Develop a policy regarding admission fees for support persons of church attendees.
- Consider offering event tickets and admission fees for other relevant church programs and services at a reduced price, or free of charge, to accompanying church attendees
- Specify the exact fee that church attendees must pay for their accompanying support person for event tickets and applicable church programs and services when making congregational announcements about these applicable programs and services.

If your church has 20 or more employees refer to Chapter 10 in the link listed above for document requirements

Notification of Disruptions

Provide notice when facilities or services that people with disabilities rely on to access your programs or services are temporarily disrupted.

In order to fulfill this requirement of the Ontario Regulation 429/07, the following are guidelines for churches.



- Include a listing of all church facilities and services that church attendees with disabilities rely on for accessibility on any membership forms. Ask church attendees to select the particular facilities or services they may require in order to create a comprehensive database.
- When notifying church attendees of temporary disruptions to facilities or services, specify the reason for the disruption, its anticipated duration, and a description of alternative facilities or services available, if any.
- Ask church attendees affected by the temporary disruption for their suggestions on potential alternative accommodations.
- Apologize for the unfortunate circumstances.
- Decide how and where to provide the notice of temporary disruption.

Consider:

- Designating the church *Accessibility Officer* to make personal phone calls to church attendees likely to be affected by the temporary disruption.
- Sending personal e-mails to church attendees likely to be affected by the disruption.
- Including a large-print notice in the e-version of the church weekly bulletin.
- Posting a large-print notification on the home page of the church accessible website.

If your church has 20 or more employees refer to Chapter 10 in the link listed above for document requirements. For sample notification templates refer to Appendix B.

Staff and Volunteer Training

Provide training on topics related to the customer service standard to church staff, volunteers, contractors and any other people who interact with the public or other third parties on your behalf.

In order to fulfill this requirement of the Ontario Regulation 429/07, the following are guidelines for churches.



Staff, Volunteers, Ushers and Greeters

- Assign a church *Accessibility Officer* or hire an expert consultant to conduct accessibility training for church staff, volunteers, ushers and greeters.
- Determine which staff and volunteers must be trained based on the training requirements outlined in the above URL link.
- Consider conducting accessibility in collaboration with another church.
- Coordinate training in a format that is appropriate to the staff and volunteers being trained and meets the legislative requirements.
- Modify accessibility training materials to reflect changes in church policies, practices and procedures.
- Train new ushers, greeters and office staff as soon as possible after they are assigned applicable duties.
- Create a policy outlining the church commitment to training front-line staff and volunteers.

- Alternatively, require ushers and greeters to complete Service-Ability, an accessibility training e-module available at: <http://www.mcass.gov.on.ca/mcass/service-ability/splash.html>

Church Administration

- Present annual educational seminar for administrative staff and lay leaders, accompanied by comprehensive educational resources/materials, at church Board of Director meeting.
- Create a policy outlining the church commitment to educating all administrative staff and lay leaders.
- Alternatively, require Board members/Leadership to complete Service-Ability, an accessibility training e-module available at: <http://www.mcass.gov.on.ca/mcass/service-ability/splash.html>

If your church has 20 or more employees refer to Chapter 10 in the link listed above for document requirements.

Note: Training to be completed before January 1, 2012

Evaluation

Establish a process for people to provide feedback on how you provide programs and services to people with disabilities and how you will respond to any feedback and take action on any complaints. Make the information about your feedback process readily available to the public.

In order to fulfill this requirement of the Ontario Regulation 429/07, the following are guidelines for churches.



- Determine how to receive feedback on churches accessibility from members.

Consider:

- Having a large-print and noticeable link on the home page of the church website to an accessibility feedback section where church attendees can submit feedback with anonymity guaranteed.
- Placing a suggestion drop box labeled “accessibility feedback” that is visible, accessible, and regularly monitored in the churches main foyer or other easy-to-access location.
- Sending out annual surveys on church accessibility.
- Including a notice in church weekly bulletins specifying a website link/email address/phone number where feedback on churches accessibility can be submitted

The Church Accessibility Committee should:

- Conduct annual needs and strengths assessments based on information from various feedback channels.

- Take reasonable steps to address solutions to complaints/negative feedback on an ongoing basis.
- Create a policy outlining the procedures followed by the *Accessibility Committee* when responding to feedback from church attendees.
- Involve the person who has voiced a complaint or concern in considering a solution.
- Prepare a document outlining the entire feedback process and post it on the church website.

Include information on:

- Where, and in what ways, members can provide feedback
- What information church attendees should include in complaints
- Who is responsible for receiving feedback
- What actions the *Accessibility Committee* will take when a complaint is received
- Whether or not the members who submit feedback can expect an answer
- How long it should take to get a response from the *Accessibility Officer* or Designate

If your church has 20 or more employees refer to Chapter 10 in the link listed above for document requirements. If you have 20 or more employees, you must prepare one or more documents to address all of the above chapter items.

For sample feedback templates refer to Appendix C & D

Appendices

Appendix A: Churches Accessibility Policy Template

This is a policy template on providing an accessible church environment to people with disabilities. You can use it to form the basis of your own policy or to give you ideas on what to include in your policy.

This sample policy template contains items that meet the requirements of the customer service standard, and also items that are not specifically required, but are good practices. Note that the policy may be revised as other standards are introduced under the Accessibility for Ontarians with Disabilities Act, 2005.

Churches Accessibility Policy Statement:

Providing Programs and Service to People with Disabilities

1. Our mission

The mission of [insert name of church] is to [insert mission of church].

2. Our commitment

In fulfilling our mission, [insert name of church] strives at all times to provide its programs and services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our programs and services and allowing them to benefit from the same services, in the same place and in a similar way as other church attendees.

3. Providing programs and service to people with disabilities

[Insert name of church] is committed to excellence in serving all church attendees including people with disabilities and we will carry out our functions and responsibilities in the following areas:

3.1 Communication

We will communicate with people with disabilities in ways that take into account their disability. We will provide all churches publications in formats that are accessible for people with disabilities. We will train staff and volunteers who communicate with church attendees on how to interact and communicate with people with various types of disabilities.

3.2 Telephone services

We are committed to providing fully accessible telephone service to our church attendees. We will train office staff to communicate with members over the telephone in clear and plain language and to speak clearly and slowly. We will offer to communicate with church attendees by [insert other means of communication that apply, e.g. email, TTY, relay services] if telephone communication is not suitable to their communication needs or is not available.

3.3 Assistive devices

We are committed to serving people with disabilities who use assistive devices to participate in and benefit from our programs and services. We will ensure that people are permitted to use their own personal assistive devices to access sanctuary ritual practice and all other applicable church programs and services. We will familiarize ushers and other front-line staff with the various assistive devices that may be used by members with disabilities while accessing our programs or services.

The church acknowledges that when circumstances prevent the use of certain assistive devices it is our responsibility to provide appropriate alternative accommodations for affected members.

The church will provide assistive devices it deems necessary for accessing its programs and services. Ushers and other front-line staff will be trained on how to use the assistive devices available on our premises including: [insert list of assistive devices available on premises]

Upon a member's request, the church will make every effort to provide the requested assistive device and/or service and to cover relevant financial expenses.

3.4 Accessibility Committee

We are committed to establishing a church Accessibility Committee to oversee all issues related to church accessibility in consultation with the church Board of Directors. Committee membership will be comprised of champions of accessibility for people with disabilities including members with disabilities and their family members.

The committee will nominate an Accessibility Officer as the chair of the committee. The Accessibility Officer will coordinate and oversee all of the functions of the Accessibility Committee and will be the liaison with the church Board of Directors.

The Accessibility Committee will have several roles.

- It will establish policies on providing accessible programs and services to church attendees with disabilities that are in compliance with the Accessibility Standards for Customer Service, Ontario Regulation 429/07.
- It will monitor church programs and services to ensure that practices and procedures are consistent with governing policies.
- It will coordinate accessibility training and training materials for all relevant church staff and volunteers.

- It will ensure that assistive devices provided by the church are in good working order and that requests for assistive devices are met.
- It will be responsible for reviewing feedback on the churches accessibility and responding to any complaints or concerns.

4. Use of service animals and support persons

We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will permit people with disabilities to be accompanied by their service animal when participating in services and programs. We will provide appropriate accommodations for both members and their service animal in cases where an activity excludes the use of service animals.

We will also ensure that all staff, volunteers and others dealing with church attendees are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter [insert name of churches]’s premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises. We will permit attendees to be accompanied by their support person when performing sanctuary rituals.

[Fees will not be charged for support persons] or [insert amount] [will be charged to the support person] accompanying the person with a disability to [insert church services or program]. Church attendees will be informed of this by a notice that will be posted in [insert name of church]’s premises and [include any other means by which church will notify members of fee].

5. Notice of temporary disruption

[Insert name of church] will provide attendees with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be delivered to attendees by means of [list notification procedure].

6. Training for staff

[Insert name of church]’s Accessibility Committee will be responsible for coordinating training for all employees, volunteers and others who deal with church attendees or other third parties on their behalf, and all those who are involved in the development and approvals of church accessibility policies, practices and procedures.

The Individuals in the following positions will be trained:

[Insert list of positions that require training]

The Accessibility Committee will also be responsible for developing training resource materials in compliance with the legislation and in consultation with the church Accessibility Training Manual

7. Feedback process

The ultimate goal of [insert name of church] is to meet and surpass expectations while serving attendees with disabilities. Comments on our programs and services regarding how well those expectations are being met are welcome and appreciated. Feedback regarding the way [insert name of church] provides programs and services o people with disabilities can be made by [insert the ways feedback can be provided, for example, e-mail, verbally, suggestion box, feedback card, etc.]. All feedback will be directed to the Officer of the church Accessibility Committee. Attendees can expect to hear back in [indicate number of days]. Complaints will be addressed according to the procedures outlined by the Accessibility Committee. These procedures will be documented by the Accessibility Committee and made available to church attendees.

8. Modifications to this or other policies

We are committed to developing church accessibility policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities. Any policy of [insert name of church] that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

9. Questions about this policy

This policy exists to achieve service excellence to church attendees with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to, [Name of Accessibility Officer] of [insert name of church].

Appendix B: Sample Documents for Notifying Church Attendees about Disruptions in Service

Sample 1

Dear Church Attendees,

The churches elevators will be out of service from April 1 to 15 for routine maintenance. Unfortunately, the upper level of the church will not be wheelchair accessible at this time. All programs scheduled during this time will be held on the churches main level. We regret any inconvenience this may cause. If you have questions or concerns, please call [phone number].

Thank you.

Accessibility Committee

Sample 2

Dear Church Attendees,

Our accessible washroom is out of service due to a broken pipe. A repair person will be on the premises tomorrow to fix it. In the interim, we have made arrangements for our guests to use the accessible washroom at 123 Main Street, which is located next door to our premises. We apologize for any inconvenience.

Thank you.

Accessibility Committee

Appendix C: Sample Documents for Obtaining Feedback

Sample 1

Attendee Feedback Form

Thank you for attending [churches name]. We value all of our attendees and strive to meet everyone's needs.

Please tell us the date and time you attended [churches name]:

Did we respond to your needs today? _ YES _ NO

Were our programs/service provided to you in an accessible manner?

_ YES _ SOMEWHAT _ NO (please explain below)

Did you have any problems accessing our programs or services?

_ YES (please explain below) _ SOMEWHAT (please explain below) _ NO

Please add any other comments you may have:

Contact information (optional)*:

Thank you.

Accessibility Committee

*Please note: There may be privacy implications for organizations collecting personal information. Churches should seek their own legal advice regarding the privacy implications of collecting personal information in this manner.

Sample 2

Record of Church attendee Feedback

Date feedback received:

Name of church attendee [optional]:

Contact information (if appropriate)*:

Details:

Follow-up:

Action to be taken:

Accessibility Committee member:

Date:

*Please note: There may be privacy implications for organizations collecting personal information. Churches should seek their own legal advice regarding the privacy implications of collecting personal information in this manner.

Appendix D: Sample Notices on the Feedback Process

Feedback process on provision of programs or services to attendees with disabilities

Sample 1

Dear Valued Church Attendee,

We strive to improve accessibility for our attendees with disabilities. We would like to hear your comments, questions and suggestions about the provision of our programs or services to people with disabilities. Please contact the [Accessibility Officer] in person, by mail or at [phone number] or by email [email address] to share your comments.

Thank you.

Accessibility Committee

Sample 2

Dear Valued Church Attendee,

We strive to improve accessibility for our attendees with disabilities. We welcome your feedback. Please call [phone number] or email [email address] to share your comments, or request a copy of our accessibility policy.

Thank you.

Accessibility Committee